

FILED  
JUN 17 2010  
FEDERAL BUREAU OF INVESTIGATION  
U.S. DEPARTMENT OF JUSTICE

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
715/721 WOODLAND, )  
WARREN, OHIO, Permanent Parcel )  
Nos. 38-005850, 38-217850, )  
and 38-862959, )  
 )  
1608 MAHONING AVENUE, N.W., )  
WARREN, OHIO, Permanent Parcel )  
No. 39-158260, )  
 )  
322 NORTH STREET, N.W., )  
WARREN, OHIO, Permanent Parcel )  
No. 39-186300, )  
 )  
1445/1447 ELM, WARREN, OHIO, )  
Permanent Parcel Nos. 38-620900 )  
and 38-620800, )  
 )  
2641 HEATHER LANE, )  
WARREN, OHIO, Permanent Parcel )  
No. 39-109825, and, )  
 )  
643 VINE AVE, N.E., )  
WARREN, OHIO, Permanent Parcel )  
No. 39-380671, )  
Defendants. )

CIVIL ACTION NO. )  
JUDGE )

4:10cv1348

JUDGE LIOI

MAG. JUDGE PEARSON

COMPLAINT IN FORFEITURE

NOW COMES plaintiff, the United States of America, by Steven M. Dettelbach, United States Attorney for the Northern District of Ohio, and Herbert J. Villa, Assistant U.S. Attorney, and files this Complaint in Forfeiture, alleging on information and belief the following:

JURISDICTION AND INTRODUCTION

1. This Court has jurisdiction over this in rem proceeding pursuant to 28 U.S.C. §§ 1345 and 1355, and 21 U.S.C. § 881.

2. This Court has venue in this matter pursuant to 28 U.S.C. § 1395.

3. The defendant real properties are subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6) and (a)(7) because they constitute proceeds from drug trafficking activities and/or were used or intended to be used to facilitate drug trafficking in violation of 21 U.S.C. § 841(a).

FORFEITURE COUNT

4. During the spring of 2008, law enforcement officers learned that Brian Cox ("Cox") would purchase around thirty-six ounces of powder cocaine at a time from "Jazzy Jeff." Cox would then purchase eighteen ounces of powdered caffeine and repack the drugs at defendant 715/721 Woodland, Warren, Ohio. As a result, Cox would then have fifty-four ounces of powder cocaine and would sell it by the ounce for a minimum of \$750.00 per ounce. Cox would store some of the powder cocaine inside defendant 715/721

Woodland, Warren, Ohio, in secret hiding places. Cox sold some of the powder cocaine from defendant 715/721 Woodland, Warren, Ohio.

5. In 2009, law enforcement officers learned that Cox operates indoor marijuana grows in the Warren, Ohio area. On June 17, 2010, federal agents executed a federal search warrant on all of the defendant real properties and discovered evidence and/or implements of a marijuana grow in each of the defendant real properties.

6. By reason of the foregoing, the defendant real properties are subject to forfeiture to the United States pursuant to the statutory authority set forth in paragraph 3 hereof.

WHEREFORE, plaintiff prays that this Court enter judgment condemning the defendant real properties and forfeiting them to the United States of America for disposition according to law, and for such other relief as this Court may deem just and proper.

Respectfully submitted,

STEVEN M. DETTELBAUGH  
United States Attorney

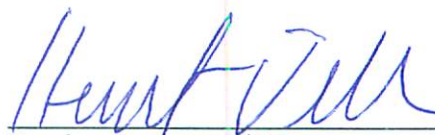
By: 

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VERIFICATION

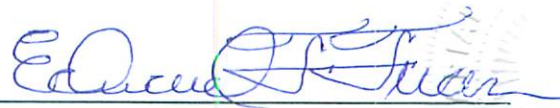
STATE OF OHIO                    )  
  ) SS.  
COUNTY OF CUYAHOGA        )

I, Herbert J. Villa, being first duly sworn, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and one of the attorneys for the Plaintiff in this action. The foregoing Complaint in Forfeiture is based upon information officially provided to me and is true as I verily believe.



Herbert J. Villa  
Assistant U.S. Attorney

Sworn to and subscribed in my presence this 17<sup>th</sup> day of June, 2010.



Notary Public

**EDWARD P. PERAN, Attorney**  
**NOTARY PUBLIC - STATE OF OHIO**  
My commission has no expiration date.  
**Section 147.03 R.C.**